

Exhibit E

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Dorlesha Barnett, as next of friend and mother of one minor child, D.J., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Dorlesha Barnett has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: D.J. – [REDACTED] 2011

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Dondrell Smith Sr., as next of friend and father of two minor children, T.W. and D.S., [REDACTED] Flint, MI 48506, claimant's counsel can be contacted at 212-605-6200. Dondrell Smith Sr. has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: D.S. – [REDACTED] 2001, T.W. – [REDACTED] 2004

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
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- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

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 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEYKONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

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ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Donald Grant, as next of friend and father of one minor child, D.G., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Donald Grant has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: D.G. – [REDACTED] 2000

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

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8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

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 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
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STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Dominique Green, as next of friend and mother of one minor child, M.D., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Dominique Green has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: M.D. – [REDACTED] 2011

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

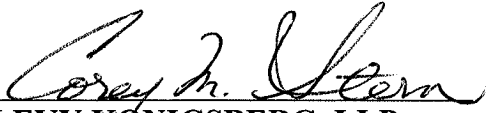
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 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

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ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Dominique Strong, as next of friend and mother of one minor child, T.R., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Dominique Strong has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: T.R. – [REDACTED] 2002

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

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12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
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Corey M. Stern
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ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Di'Anndra Davis, as next of friend and mother of two minor children, J.D. 1 and J.D. 2, [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Di'Anndra Davis has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: J.D.1 – [REDACTED] 2012, J.D.2 – [REDACTED] 2007

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

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 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
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New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Diandre Walker, as next of friend and father of three minor children, A.W., B.W. and D.W., [REDACTED] Flint, MI 48506, claimant's counsel can be contacted at 212-605-6200. Diandre Walker has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.W. – [REDACTED] 2009, B.W. – [REDACTED] 2006, D.W. – [REDACTED] 2010

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

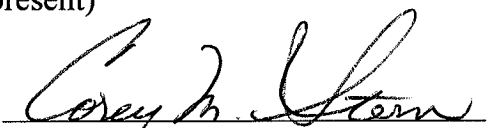
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 6000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 6000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Dewayne Green, as next of friend and father of three minor children, J.M., K.P. and M.P., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Dewayne Green has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: K.P. – [REDACTED] 2011, M.P. – [REDACTED] 2015, J.M. – [REDACTED] 2004

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 6000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 6000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Deva James, as next of friend and mother of one minor child, A.W., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Deva James has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.W. – [REDACTED] 2006

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
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- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
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- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Deshna Marshall, as next of friend and mother of one minor child, S.M., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Deshna Marshall has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: S.M. – [REDACTED] 2008

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

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- g. Darren Lytle, Office of Research and Development, Region 5
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- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

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 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
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 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
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- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Derek Davis, as next of friend and father of three minor children, A.D., C.D.1 and C.D. 2, [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Derek Davis has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.D. – [REDACTED] 2011, C.D.1 – [REDACTED] 2013, C.D.2 – [REDACTED] 2009

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

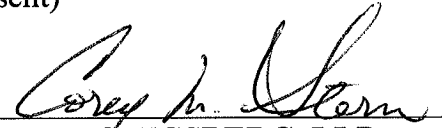
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
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 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 6000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 6000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Dequintre R Smith, as next of friend and father of one minor child, D.S., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Dequintre R Smith has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: D.S. – [REDACTED] 2000

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

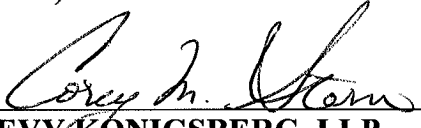
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
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- e. Thomas Poy, Ground Water and Drinking Branch Region 5
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- g. Darren Lytle, Office of Research and Development, Region 5
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 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: DeQuarus Dudley, as next of friend and father of two minor children, D.D.1 and D.D.2, [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. DeQuarus Dudley has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: D.D.1 – [REDACTED] 2010, D.D.2 – [REDACTED] 2016

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

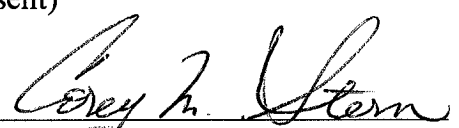
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Denise Rankin, as next of friend and mother of two minor children, K.S. and K.M., [REDACTED] Garland, TX 75042, claimant's counsel can be contacted at 212-605-6200. Denise Rankin has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: K.S. – [REDACTED] 2008, K.M. – [REDACTED] 2006

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

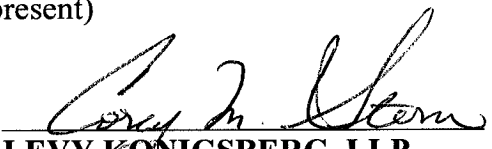
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Demita Miller, as next of friend and mother of two minor children, D.M. and J.M., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Demita Miller has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: D.M. – [REDACTED] 2013, J.M. – [REDACTED] 2014

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Demetria Killin, as next of friend and mother of two minor children, D.J. and J.K., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Demetria Killin has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: D.J. – [REDACTED] 2015, J.K. – [REDACTED] 2012

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
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- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Delores Davis, as next of friend and mother of one minor child, D.B., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Delores Davis has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: D.B. – [REDACTED] 2014

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
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- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
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- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
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800 Third Avenue, 11th Floor
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- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Delandra Boone, as next of friend and mother of three minor children, C.B., M.B. and R.B., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Delandra Boone has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: C.B. – [REDACTED] 1999, R.B. – [REDACTED] 2001, M.B. – [REDACTED] 2006

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
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- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
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- i. Jeff Kelley, Director, Office of External Communications, Region 5
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- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 6000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 6000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Dekecia Hutchins, as next of friend and mother of two minor children, J.H. 1 and J.H. 2, [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Dekecia Hutchins has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: J.H.2 – [REDACTED] 2009, J.H.1 – [REDACTED] 2002

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

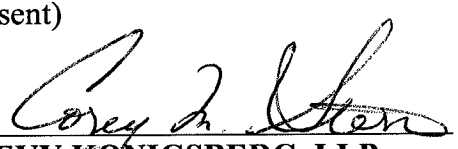
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Deidra Mansfield, as next of friend and mother of four minor children, M.L., M.H., L.S. and E.S., [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Deidra Mansfield has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: E.S. – [REDACTED] 2013, L.S. – [REDACTED] 2011, M.L. – [REDACTED] 2003, M.H. – [REDACTED] 2009

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI

- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI
 - q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 8000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 8000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Deetta Bright, as next of friend and mother of four minor children, D.B., H.B., J.B. 1 and J.B. 2, [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Deetta Bright has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: D.B. – [REDACTED] 2011, H.B. – [REDACTED] 2008, J.B.1 – [REDACTED] 2000, J.B.2 – [REDACTED] 2003

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI

- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI
 - q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 8000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 8000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Debra Soto, as next of friend and mother of three minor children, E.S. 1, E.S. 2 and S.T., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Debra Soto has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: E.S. – [REDACTED] 2006, E.S. – [REDACTED] 2007, S.T. – [REDACTED] 2004

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S., Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 6000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 6000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**


STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).
2. Claimant and Claimant's Representative: Debra Campbell, as next of friend and mother of one minor child, S.C., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Debra Campbell has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.
3. Type of employment: Minor Children – No Employment
4. Date(s) of Birth: S.C. – [REDACTED] 2007
5. Marital Status: Single
6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.
7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.
8. Basis of Claim: Negligence. The SF-95 required details are described below.
9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS


1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).
2. Claimant and Claimant's Representative: Debra Altheimer-Richardson, as next of friend and legal guardian of four minor children, A.R., G.R., S.R. and Z.R., [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Debra Altheimer-Richardson has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.
3. Type of employment: Minor Children – No Employment
4. Date(s) of Birth: A.R. – [REDACTED] 2002, G.R. – [REDACTED] 2012, S.R. – [REDACTED] 2010, Z.R. – [REDACTED] 2005
5. Marital Status: Single
6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.
7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI

- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI
 - q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 8000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 8000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Debony Thomas, as next of friend and mother of two minor children, J.S. 1 and J.S. 2, [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Debony Thomas has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: J.S. – [REDACTED] 2012, J.S. – [REDACTED] 2009

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Deaisha Greenlee, as next of friend and mother of two minor children, N.G. and S.G., [REDACTED] Jackson City, TN 37604, claimant's counsel can be contacted at 212-605-6200. Deaisha Greenlee has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: N.G. – [REDACTED] 2003, S.G. – [REDACTED] 2008

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
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- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

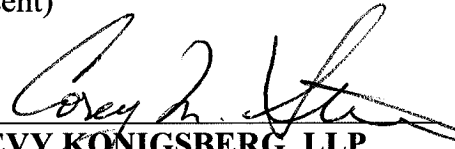
STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).
2. Claimant and Claimant's Representative: DayVee Bowens, as next of friend and mother of one minor child, R.B., [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. DayVee Bowens has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.
3. Type of employment: Minor Children – No Employment
4. Date(s) of Birth: R.B. – [REDACTED] 2002
5. Marital Status: Single
6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.
7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.
8. Basis of Claim: Negligence. The SF-95 required details are described below.
9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
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- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS


1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).
2. Claimant and Claimant's Representative: Dayquichiesa Martin, as next of friend and mother of four minor children, D.W., D.J.1, D.J.2 and L.E., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Dayquichiesa Martin has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.
3. Type of employment: Minor Children – No Employment
4. Date(s) of Birth: D.J. – [REDACTED] 2004, D.J. – [REDACTED] 2006, D.W. – [REDACTED] 2008, L.E. – [REDACTED] 2013
5. Marital Status: Single
6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.
7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
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- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
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- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
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- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
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- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI

- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI
 - q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 8000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 8000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Dayna Norton, as next of friend and mother of one minor child, S.C., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Dayna Norton has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: S.C. – [REDACTED] 2010

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

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- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
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- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
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 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
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Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Dayna Mater, as next of friend and mother of one minor child, D.M., [REDACTED] Flint, MI 48532, claimant's counsel can be contacted at 212-605-6200. Dayna Mater has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: D.M. – [REDACTED] 2009

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Dawn Skyrme, as next of friend and mother of two minor children, D.S. 1 and D.S. 2, [REDACTED] Flint, MI 48506, claimant's counsel can be contacted at 212-605-6200. Dawn Skyrme has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: D.S.1 – [REDACTED] 2000, D.S.2 – [REDACTED] 2000

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

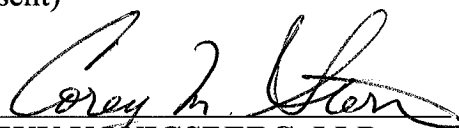
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: David Bishop, as next of friend and father of one minor child, N.B., [REDACTED] Flint, MI 48506, claimant's counsel can be contacted at 212-605-6200. David Bishop has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: N.B. – [REDACTED] 2006

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

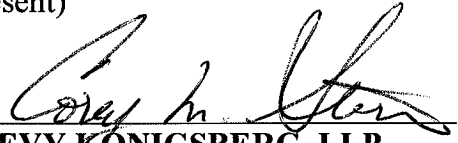
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Dashira Balknight, as next of friend and mother of one minor child, J.G., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Dashira Balknight has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: J.G. – [REDACTED] 2016

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**


STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).
2. Claimant and Claimant's Representative: Dashawn Malone, as next of friend and father of one minor child, A.M., [REDACTED] Mount Morris, MI 48458, claimant's counsel can be contacted at 212-605-6200. Dashawn Malone has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his child and act on their behalf.
3. Type of employment: Minor Children – No Employment
4. Date(s) of Birth: A.M. – [REDACTED] 2013
5. Marital Status: Single
6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.
7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.
8. Basis of Claim: Negligence. The SF-95 required details are described below.
9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
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- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Darryl Shoemo, as next of friend and legal guardian of one minor child, R.W., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Darryl Shoemo has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: R.W. – [REDACTED] 2005

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Darlene Harden, as next of friend and mother of one minor child, B.H., [REDACTED] Flint, MI 48532, claimant's counsel can be contacted at 212-605-6200. Darlene Harden has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: B.H. – [REDACTED] 2013

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

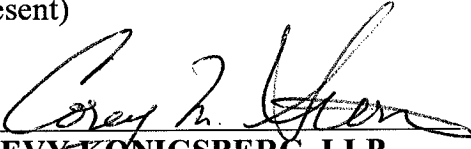
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: DaRiesha Bobo, as next of friend and mother of two minor children, J.D. and J.S, [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. DaRiesha Bobo has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: J.D. – [REDACTED] 2011, J.S. – [REDACTED] 2015

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Danyell Croom, as next of friend and mother of five minor children, S.C., M.C., D.C., Z.S. and K.G., [REDACTED] Flint, MI 48532, claimant's counsel can be contacted at 212-605-6200. Danyell Croom has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: K.G. – [REDACTED] 2008, D.C. – [REDACTED] 2009, M.C. – [REDACTED] 2006, S.C. – [REDACTED] 2004, Z.S. – [REDACTED] 2005

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI

- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI
 - q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 10000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 10000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Danjuma Greer Sr., as next of friend and father of one minor child, D.G., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Danjuma Greer Sr. has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: D.G. – [REDACTED] 2005

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

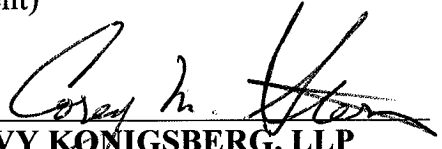
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
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- g. Darren Lytle, Office of Research and Development, Region 5
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- i. Jeff Kelley, Director, Office of External Communications, Region 5
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 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Danielle Parker, as next of friend and mother of four minor children, A.S., D.O., M.O. and S.S., [REDACTED] Burton, MI 48529, claimant's counsel can be contacted at 212-605-6200. Danielle Parker has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.S. – [REDACTED] 2003, S.S. – [REDACTED] 2005, D.O. – [REDACTED] 2013, M.O. – [REDACTED] 2014

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

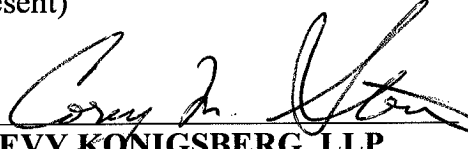
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
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- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
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- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI
 - q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 8000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 8000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Danielle Chapman, as next of friend and mother of one minor child, M.C., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Danielle Chapman has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: M.C. – [REDACTED] 2009

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
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- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
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 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Daniel Perryman, as next of friend and father of one minor child, N.R., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Daniel Perryman has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: N.R. – [REDACTED] 2004

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

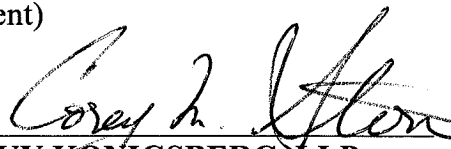
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

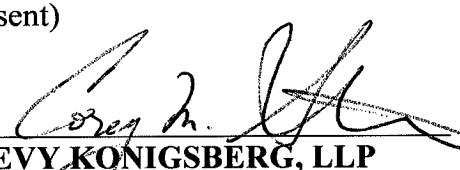
STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).
2. Claimant and Claimant's Representative: Daniel Gill, as next of friend and father of one minor child, A.G., [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Daniel Gill has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his child and act on their behalf.
3. Type of employment: Minor Children – No Employment
4. Date(s) of Birth: A.G. – [REDACTED] 2008
5. Marital Status: Single
6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.
7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.
8. Basis of Claim: Negligence. The SF-95 required details are described below.
9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Danial Arnold, as next of friend and father of one minor child, D.A., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Danial Arnold has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: D.A. – [REDACTED] 2011

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Dajaneke Stockman, as next of friend and mother of one minor child, K.S., [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Dajaneke Stockman has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: K.S. – [REDACTED] 2012

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
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- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
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- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Cynthia Warren, as next of friend and mother of one minor child, R.R., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Cynthia Warren has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: R.R. – [REDACTED] 2008

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
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- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
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- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
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14. Date of Signature: 4/19/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Cynthia Ferguson-Williams, as next of friend and mother of two minor children, D.W. and R.W., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Cynthia Ferguson-Williams has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: D.W. – [REDACTED] 2005, R.W. – [REDACTED] 2001

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

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- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
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 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Cyeenah Kalimah, as next of friend and mother of four minor children, C.K.1, C.K.2, N.A.1 and N.A.2, [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Cyeenah Kalimah has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: C.K.2 – [REDACTED] 2006, C.K.1 – [REDACTED] 2008, N.A.1 – [REDACTED] 2009, N.A.2 – [REDACTED] 2016

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

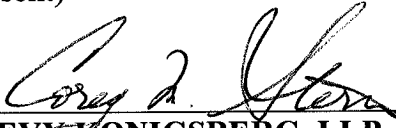
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI

- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI
 - q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 8000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 8000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Cyara Sharpe, as next of friend and mother of two minor children, G.B and W.B., [REDACTED] Flint, MI 48506, claimant's counsel can be contacted at 212-605-6200. Cyara Sharpe has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: W.L. – [REDACTED] 2012, G.A. – [REDACTED] 2014

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Crystle Davidson, as next of friend and mother of one minor child, J.F., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Crystle Davidson has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: J.F. – [REDACTED] 2007

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

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- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
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- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
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- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
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- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

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 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/19/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM